

FILED

APR 24 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO.

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS SCAMAN,

Defendant.

No.

4:14CR124 CEJ

INFORMATION

COUNT ONE

The United States Attorney charges that:

On or about June 8, 2009, and July 30, 2009, in the Eastern District of Missouri, the defendant,

THOMAS SCAMAN,

not being a licensee under the provisions of Chapter 40 of Title 18 of the United States Code, knowingly cause to be transported and shipped explosive materials in violation of Title 18, United States Code, Sections 842(a)(3)(A) and 844(a).

FORFEITURE ALLEGATION

The United States Attorney further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2)(B), upon conviction of an offense in violation of Title 18, United States Code, Sections 842 or 844, the defendant shall forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such violations.

2. Pursuant to Title 18, United States Code, Sections 844(c) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 842 or 844, the defendant shall forfeit to the United States of America any explosive materials involved or used or intended to be used in such violations.

3. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

4. Specific property subject to forfeiture includes, but is not limited to, the following: (hereafter the "subject property")

Hunan Liuyang Global Fireworks Co., Ltd
Invoice Number: PF4009
Entry #: U10-30906212

Number	Description	Quantity/Total Units
HF401	16 Shots - Royal Crown	150 (ctns)/ 3000(ea)
HF402	19 Shots - Flashlight Blue	150 (ctns)/ 3000(ea)
HF403	12 Shots - Under Siege	150 (ctns)/ 2400(ea)
HF404	16 Shots - Good Gun	150 (ctns)/ 1800(ea)
HF405	10 Shots - Ghost Festival	101 (ctns)/ 1616(ea)
PF2147	25 Shots - Honor of Li Tian	40 (ctns)/ 159(ea)
PF2151	25 Shots - Purple Green Peony	40 (ctns)/ 159(ea)
PF2252	25 Shot Essence of Peony	40 (ctns)/ 159(ea)
PF S068	19 Shots - Coconut Grove Song	40 (ctns)/ 239(ea)
PF S032	12 Shots - Desert @ Night (Invoiced as 12 shots: Conqueror)	40 (ctns)/ 480(ea)
PF S276	12 Shots - Autumn Drizzle	40 (ctns)/ 480(ea)

P125	30 Shots - Flower King	40 (ctns)/ 159(ea)
P124	Safety Fuse – 3” Segments (Invoiced as 96 shots: China dragon)	50 (ctns)/ 2,5000,000(ea)
PFC401	16 Shot American Power	40 (ctns)/ 479(ea)

Hunan Liuyang Global Fireworks Co., Ltd

Invoice Number: PF4010

Entry #: U10-30907871

Number	Description	Quantity/Total Units
PFC2105	Safety Fuse – Spools (Box Stated- 205 shots:Big Sky)	50 (ctns)/ 100(ea)
PFC2107	25 Shots -Friday Night Special	82 (ctns)/ 328(ea)
HF405	10 Shots - Ghost Festival	49 (ctns)/ 784(ea)
HF406	20 Shots - Air Spectacular	150 (ctns)/ 600(ea)
HF407	25 Shots - Marvellous World	150 (ctns)/ 600(ea)
HF408	28 Shots - Contest	150 (ctns)/ 450(ea)
HF409	30 Shots - Car Contest	150 (ctns)/ 300(ea)
HF410	35 Shots - Sky Light	150 (ctns)/ 300(ea)
P124	96 Shots - China Dragon	40 (ctns)/ 80(ea)

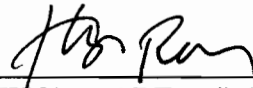
4. If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty, the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Respectfully submitted,

RICHARD G. CALLAHAN
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